

# Exhibit 2

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Department of State  
Office of Information Programs and Services  
A/GIS/IPS/RL  
SA-2, Suite 8100  
Washington, DC 20522-0208

Re: FOIA Request – Julio Cury visa revocation

To Whom It May Concern:

This is a request on behalf of my clients Takao Yamada and Julio Cury, a/k/a Julio Cury David, under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, *et seq.*, for copies of **all records, including emails, pertaining to the revocation of the visa previously held by Mr. Cury**. This explicitly includes all information relied upon by the Department of State (“State”) in making the determination to revoke Mr. Cury’s visa, as well as all information discussing the revocation itself. I have attached the necessary paperwork authorizing State to release this information to Mr. Yamada and myself.

Please note that in the Western District of Washington, where Mr. Yamada resides, it has been previously held that Section 222(f) of the Immigration and Nationality Act, upon which State regularly relies in similar situations as this, does not apply to visa revocations. *Guerra v. United States*, No. 09-1027, 2010 U.S. Dist. LEXIS 132999, at \*5 (W.D. Wa. Dec. 15, 2010). Given that any judicial review of State’s response will take place in the Western District of Washington (since Mr. Cury does not reside in the United States), and that this holding is not unique or a fluke, *see also Mantilla v. Dep’t of State*, No. 12-21109, 2012 U.S. Dist. LEXIS 136152, at \*11 (S.D. Fla. Sept. 24, 2012), we accordingly anticipate that State will not waste any time arguing that these records about a visa *revocation* can be withheld under Exemption (b)(3).

Since this is a first-party request for a small number of easily locatable records, my clients do not anticipate being assessed any fees. Please provide all responsive records in electronic format.

Thank you for your prompt attention to this request. Your cooperation in this matter would be appreciated. If you wish to discuss this request, please do not hesitate to contact me.

Sincerely, Kel McClanahan